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David J. Sheehan Nicholas J. Cremona

Ona T. Wang James H. Rollinson

v.

ANGELA TILETNICK,

Defendant.

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION, Adv. Pro. No. 08-01789 (SMB) Plaintiff-Applicant, SIPA LIQUIDATION v. (Substantively Consolidated) BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant. In re: BERNARD L. MADOFF, Debtor. IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Adv. Pro. No. 10-04306 (SMB) Plaintiff,

STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL OF ADVERSARY PROCEEDING WITH PREJUDICE

Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and defendant Angela Tiletnick ("Defendant"), by and through her counsel, Chaitman LLP (collectively, the "Parties"), hereby stipulate and agree to the following:

- 1. On November 26, 2010, the Trustee filed, and on January 14, 2011, the Trustee served the Complaint against Angela Tiletnick.
- 2. On August 13, 2015, Angela Tiletnick filed and served an amended answer on the Trustee.
- 3. In accordance with Federal Rule of Bankruptcy Procedure 7041, and Federal Rule of Civil Procedure 41(a)(1)(ii), the Parties hereby stipulate to a dismissal with prejudice and without costs of the Trustee's claims against Defendant in the above-captioned adversary proceeding, and a dismissal with prejudice of the adversary proceeding.
- 4. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.
- 5. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall

be deemed an original.

Dated: March 20, 2017 New York, New York

Of Counsel: James H. Rollinson

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James H. Rollinson

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By: ____/s/ Ona T. Wang_

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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and

the Estate of Bernard L. Madoff

Dated: March 20, 2017

New York, New York

By: <u>/s/Helen Davis Chaitman</u>

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Attorneys for Defendant Angela Tiletnick

SO ORDERED

Dated: March 20th, 2017 New York, New York

<u>/s/ STUART M. BERNSTEIN</u>_

HONORABLE STUART M. BERNSTEIN UNITED STATES BANKRUPTCY JUDGE